

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC.,
PELVIC REPAIR SYSTEMS
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE ATTACHED EXHIBITS:

**JOINT MOTION TO DISMISS DEFENDANT
AMERICAN MEDICAL SYSTEMS, INC. WITH PREJUDICE**

Plaintiffs in the cases listed on the attached Exhibits A-T and defendant American Medical Systems, Inc. ("AMS") advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims. Accordingly, Plaintiffs and AMS jointly move the court to dismiss AMS as a defendant in these actions with prejudice, and terminate AMS from the docket in these actions, parties to bear their own costs. Other defendants remain in these actions, and plaintiffs will continue to pursue these actions against them.

Respectfully:

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Dated: August 3, 2016

EXHIBIT A – ADAMS FIETZ

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-14647	April Marie Denson, David Denson v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT B – AYLSTOCK WITKIN KREIS & OVERHOLTZ

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:14-CV-07968	Alice B. Hardwick, George H. Hardwick v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-09125	Sandra C. Renteria v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-09141	Cynthia Ann Simpson v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-16124	Wilma S. Bustillos v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT C – NAPOLI BERN RIPKA SHKOLNIK & ASSOCIATES

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-07808	Geri Crotwell, Carl Crotwell v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT D – CAREY DANIS & LOWE

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-29895	Diane Pyser v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT E – CORY WATSON

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-13960	Else Brickhaus, Richard Brickhaus v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT F – HEARD ROBINS CLOUD & BLACK

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-24981	Hallie Schmidt Ketchum, James Ketchum v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-CV-28115	Clova Watt, Jerry Watt, Sr. v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-17665	Angelina Duke v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-20300	Omega Blankenship v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-21438	Kimberly Nightingale, Terry Nightingale v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-22466	Rosemary Pitra v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-27908	Sandra Myers, Frederick Myers v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT G – JENSEN & ASSOCIATES

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-17388	Veronica Santillan v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc., Boston Scientific Corporation

EXHIBIT H – SOLIS LAW FIRM

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-16436	Jean Savov, Steven Savov v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc., Boston Scientific Corporation

EXHIBIT I – MAGANA CATHCART & MCCARTHY

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-11402	Lillian Biunno, Joe Biunno v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-CV-14367	Guadalupe Salazar v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT J – MATTHEWS & ASSOCIATES

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:12-CV-03582	Patricia Ramirez v. Johnson & Johnson, Ethicon, Inc., Ethicon Women's Health and Urology, Gynecare, American Medical Systems, Inc., and Boston Scientific Corporation

EXHIBIT K – MILLER WEISBROD

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-21786	Linda Orsburn v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-CV-21820	Antoinette M. Virgilio v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT L – SMITH STAG

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:12-CV-08325	Annie Honold v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-CV-05311	Phyllis Ridenour, Howard Ridenour v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-CV-14500	Fay Driscoll v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT M – SUMMERS & JOHNSON

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-18884	Elizabeth Evans v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT N– THE MOODY LAW FIRM

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-00146	Rosaline Murray, Tommy Murray v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc., C. R. Bard, Inc., Sofradim Production SAS

EXHIBIT O – THE NATIONS LAW FIRM

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-12338	Alice L. Dister v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc., Boston Scientific Corporation
2:14-CV-18775	Susan Ann Baker, Vincent Baker v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-18931	Helen Marie Monarch, Carl Monarch v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-19031	Lois Virginia Harrison, Richard Harrison v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT P – THE POTTS LAW FIRM

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-26431	Sandra Helton, Frank Thomas Helton v. Johnson & Johnson, American Medical Systems, Inc., Ethicon, Inc.
2:14-CV-03325	Lori Fraley, Ernie Fraley v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-08246	Sherry Rimer, Gary Rimer v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-13732	Henrietta McElhone, Patrick McElhone v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-16771	Beth Christensen, Timothy Christensen v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT Q – THE WILNER FIRM

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-12823	Dorothy A. Kelly v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-15563	Kathleen S. Thomas v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT R – VERHINE & VERHINE

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:12-CV-05726	Ada Lauderdale, William F. Lauderdale, Jr. v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-CV-11089	Mary M. Christian, John M. Christian v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT S – WATERS & KRAUS

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-10784	Carol E. Wilson, James K. Wilson v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-CV-11729	Judy L. Moore v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-07854	Karen Struchko, Richard E. Struchko, Sr. v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-21060	Brenda J. Seltzer, Jackson Seltzer v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT T – WILLIAMS KHERKHER HART BOUNDAS

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-16156	Tammiela McLaughlin, Jeffrey McLaughlin v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-CV-20544	Jennifer Singleton, Denny Singleton v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-CV-30116	Dorothy Smelcer v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-CV-31667	Priscilla Tsosie v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-CV-32665	Sandra Flournoy, Steve Flournoy v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-15129	Elizabeth Firchow v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc., Mentor Worldwide LLC, Coloplast Corp.

CERTIFICATE OF SERVICE

I hereby certify that on August 3, 2016, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/ Barbara R. Binis